

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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In re: :
THE FINANCIAL OVERSIGHT AND : PROMESA
MANAGEMENT BOARD FOR PUERTO RICO, : Title III
as representative of : Case No. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO *et al.*, : (Jointly Administered)
Debtors.¹ :
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**ORDER ENFORCING AUTOMATIC STAY AND COURT'S JUNE 29, 2017 ORDER
CONFIRMING APPLICATION OF AUTOMATIC STAY WITH RESPECT TO GDB
RESTRUCTURING**

Upon the *Urgent Motion of Official Committee of Unsecured Creditors, Pursuant to
Bankruptcy Code Sections 105(a) and 362, for Entry of Order Enforcing Automatic Stay and
Court's June 29, 2017 Order Confirming Application of Automatic Stay with Respect to GDB
Restructuring* (the "Motion");² and the Court having found it has subject matter jurisdiction over this matter pursuant to section 306(a) of PROMESA; and it appearing that venue is proper pursuant to section 307(a) of PROMESA; and the Court having found that the relief requested in the Motion is in the best interests of the Title III Debtors, their creditors, and other parties in

¹ The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

² All capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Urgent Motion .

interest; and the Court having found that the movant provided adequate and appropriate notice of the Motion under the circumstances, and that no other or further notice is required; and the Court having reviewed the Motion ; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and any objections to the relief requested in the Motion having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The GDB Restructuring violates the automatic stay under section 362 of the Bankruptcy Code and also violates the Court's Stay Order.
3. Any limitations on claims that have been or may be asserted by the Title III Debtors against GDB or related third-parties are void
4. Any transfer of assets of GDB that could be used to satisfy claims of the Title III Debtors by GDB in connection with the GDB Restructuring is void.
5. This Court shall retain exclusive jurisdiction over all matters pertaining to the implementation, interpretation, and enforcement of this Order.

Dated: September ___, 2018

HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE